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14 Attorneys for Plaintiff, Andrea Love

15 **UNITED STATES DISTRICT COURT**

16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **ANDREA LOVE**, an individual,

18 Plaintiff,

19 vs.

20 **ELLEN STONE**, an individual; and DOES 1
21 through 25, inclusive

22 Defendants.

Case No.: 2:23-cv-3122

**COUNSEL JASON M. INGBER'S
DECLARATION IN SUPPORT OF
PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO REMAND REMOVED
ACTION**

(28 U.S.C.S. §1447(c))

Complaint Filed: 2.28.2023
LASC Case No.: 23STCV04399

1 1. I, Jason M. Ingber, work with RGLaywers LLP and Solomon Gresen and am co-
2 counsel and lead trial counsel for Plaintiff for this matter and if called upon to testify could and
3 would testify to the following under the penalty of perjury.

4 2. Plaintiff filed this Action in Los Angeles Superior Court on February 28, 2023.
5 On or about May 12, 2023, I spoke with Defendant's counsel over the phone regarding our
6 overall perspectives to this case, a roadmap to potential resolution, and Plaintiff's plans to
7 challenge Defendant's removal on the grounds that Defendant was and is domiciled in Los
8 Angeles, California. On or about June 7, 2023 (among other occasions), I met with defense
9 counsel Brook Hammond in person at her office, and explained Plaintiff's intent to file a Motion
10 to Remand on account of the fact that Defendant lives in Los Angeles, and I followed up with
11 numerous emails, and a zoom call with defense counsel Brooke Hammond regarding the same.

12
13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct. Executed this 3rd day of July 2023, in Los Angeles, California.

15 /s/ Jason M. Ingber
16 Jason M. Ingber
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